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U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA  
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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**BILL OF INFORMATION FOR THEFT OF GOVERNMENT FUNDS**

UNITED STATES OF AMERICA

v.

BERTRAND R. TAYLOR

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\*

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\* \* \*

CRIMINAL NO.

SECTION:

VIOLATION: 18 U.S.C. §641

**11-214**

**SECT. F MAG. 5**

The United States Attorney charges that:

**COUNT 1 - THEFT OF GOVERNMENT FUNDS**

**A. AT ALL MATERIAL TIMES HEREIN:**

1. The United States Social Security Administration ("SSA") was an agency of the United States created to provide for the general welfare by establishing a system of federal benefits. Specifically, SSA was responsible for the administration of numerous programs including, but not limited to, SSA retirement benefits, survivors and disability insurance programs ("RSDI"), the Supplemental Security Income program for aged and disabled indigent persons ("SSI"), and Social Security Account Number issuance, reporting, and recording.

2. SSA was also charged with administering benefits under the Social Security Title II ("SST2") program. SST2 benefits were paid to aged (*i.e.*, 62 years old and over), blind and disabled persons who have worked long enough in employment covered by Social Security to meet insured

status requirements. Other persons, such as a spouse, a widow(er), minor children, and survivors may also be entitled to SST2 benefits.

3. When a recipient of SSA benefits is incapable of managing their payments for any reason, including because the recipient is a minor, the SSA may appoint someone, usually a family member, to serve as a representative payee. A representative payee is responsible for handling and taking care of the benefits. A representative payee is required to, among other things, report any and all material changes in the status or condition (*i.e.*, changes that may affect the recipient's eligibility for benefits) of the payee whom they represent, such as the payee's death, to SSA promptly and to return any payments to which the claimant is not entitled.

4. M.T., the mother of the defendant, **BERTRAND TAYLOR**, was a SSA beneficiary who died on or about June 3, 1984.

5. The defendant, **BERTRAND TAYLOR**, was a representative payee for M.T.

6. From January 2010 to August 2010, all SST2 benefits paid to M.T. were paid to the defendant, **BERTRAND TAYLOR**, via Direct Debit Card through Commercial Bank. From December 2005 to December 2009, all SST2 benefits paid to M.T. were paid to the defendant, **BERTRAND TAYLOR**, via direct deposit to his Capital One Bank account. Prior to December 2005, all SST2 benefits paid to M.T. were paid to the defendant, **BERTRAND TAYLOR**, via United States Treasury check.

7. As representative payee for M.T., the defendant, **BERTRAND TAYLOR**, was required to report any and all material changes in the status or condition of M.T. to SSA.

8. After the death of M.T. on June 3, 1984, SSA continued to provide M.T.'s monthly benefits to the defendant, **BERTRAND TAYLOR**, on a regular basis. At no time, during that period, did defendant, **BERTRAND TAYLOR**, inform the SSA of M.T.'s death.

9. From on or about June 4, 1984 to on or about September 1, 2010, in the Eastern District of Louisiana, the defendant, **BERTRAND TAYLOR**, received the SST2 benefits paid by SSA to his deceased mother and used the funds for his own gain and benefit. In total, the defendant, **BERTRAND TAYLOR**, received SST2 benefits after M.T.'s death in the amount of \$175,184.00, to which he was not entitled.

10. After receiving these benefits, the defendant, **BERTRAND TAYLOR**, accessed and withdrew the SST2 benefits and converted them to his personal use, all the while knowing that he was not entitled to receive them.

**B. THE OFFENSE OF THEFT OF GOVERNMENT FUNDS:**

11. From on or about June 4, 1984, to on or about September 1, 2010, in the Eastern District of Louisiana, the defendant, **BERTRAND TAYLOR**, did knowingly steal, purloin, and convert to his own use money of the United States Social Security Administration, a department and agency of the United States, to which he was not entitled, having a value of \$175,184.00.

All in violation of Title 18, United States Code, Section 641.

**NOTICE OF FORFEITURE**

1. The allegations in this Bill of Information are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Count 1, the defendant, **BERTRAND TAYLOR**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 641, including but not limited to:

- a. \$175,184.00 in United States Currency.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

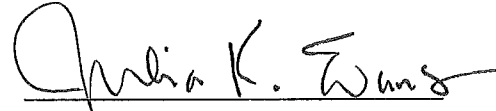
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

  
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New Orleans, Louisiana  
September 1, 2011